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2 Federal Public Defender
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7 Attorney for Ramon Avendano-Soto

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 RAMON AVENDANO-SOTO, and
15 JORGE ALFREDO SOTO

16 Defendant.

Case No. 2:20-CR-003-APG-EJY

**STIPULATION TO CONTINUE
EVIDENTIARY HEARING**
(Third Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Kevin Schiff, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Raquel Lazo, Assistant Federal Public Defender, counsel for Ramon Avendano-Soto, and
21 Christopher Oram, counsel for Jorge Alfredo Soto, that the Evidentiary Hearing currently
22 scheduled on January 7, 2021 at 9:30 am, be vacated and continued to a date and time
23 convenient to the Court, but no sooner than sixty (60) days.

24 This Stipulation is entered into for the following reasons:

25 1. Defense counsel for Mr. Avendano-Soto has a conflict with the currently
26 scheduled hearing.

1 2. Defense counsel for Mr. Avendano-Soto has three other evidentiary hearings
2 scheduled in January and therefore requests this additional time in order to be able to fully
3 prepare for each hearing.

4 3. Moreover, both defendants reside out of state and would be traveling for the
5 hearing. In light of the COVID-19 pandemic and its spread, the parties believe it would be
6 safer to minimize the defendants' out of state travel at this time.

7 4. Defendants are not incarcerated and do not object to a continuance.

8 5. Additionally, denial of this request for continuance could result in a miscarriage
9 of justice.

10 This is the third request for continuance filed herein.

11 DATED this 18th day of December, 2020.

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13 RENE L. VALLADARES
14 Federal Public Defender

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16 NICHOLAS A. TRUTANICH
17 Acting United States Attorney

18
19 */s/ Raquel Lazo*
20 By _____
21 RAQUEL LAZO
22 Assistant Federal Public Defender

23
24 */s/ Kevin Schiff*
25 By _____
26 KEVIN SCHIFF
 Assistant United States Attorney

27
28 */s/ Christopher Oram*
29 By _____
30 CHRISTOPHER ORAM
31 Counsel for Jorge Alfredo Soto

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

RAMON AVENDANO-SOTO, and
JORGE ALFREDO SOTO

Defendant.

Case No. 2:20-CR-003-APG-EJY

ORDER

V.

RAMON AVENDANO-SOTO, and
JORGE ALFREDO SOTO

Defendant.

Based on the Stipulation of counsel and good cause appearing,

IT IS THEREFORE ORDERED that the Evidentiary Hearing currently scheduled on January 7, 2021 at the hour of 9:30 a.m., be vacated and continued to March 30, 2021 at the hour of 9:30 a.m. in Courtroom 3A.

DATED this 18 day of December, 2020.

Elayne J. Zouchal
UNITED STATES MAGISTRATE JUDGE